

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

In re VALEANT PHARMACEUTICALS
INTERNATIONAL, INC. SECURITIES
LITIGATION

Honorable Michael A. Shipp, U.S.D.J.

Civil Action No.: 3:15-cv-7658
(MAS)(LHG)

NOTICE OF MOTION FOR PRO HAC
VICE ADMISSION OF MARK FLINN
AND MEREDITH STEWART

MOTION DAY: August 19, 2019

PLEASE TAKE NOTICE that on August 19, 2019, or as soon thereafter as counsel may be heard, the undersigned, counsel for Defendant J. Michael Pearson, shall move pursuant to Local Civil Rule 7.1 before the Honorable Michael A. Shipp, U.S.D.J., United States District Court, District of New Jersey, at the Courthouse located at 402 East State Street, Trenton, New Jersey 08608, for an Order admitting Mark Flinn and Meredith Stewart, of the law firm of Debevoise & Plimpton LLP, to appear before this Court pro hac vice for the purpose of acting as counsel to Defendant J. Michael Pearson in this action.

PLEASE TAKE FURTHER NOTICE that in support of this Motion, Defendant J. Michael Pearson shall rely upon the annexed Declarations of Mark Flinn and Meredith Stewart.

It is respectfully requested that the Court rule upon this Motion, without requiring the appearance of counsel, pursuant to Fed. R. Civ. P. 78.

Pursuant to Local Civil Rule 7.1(d)(4), Defendant submits this statement in lieu of a submission of a formal brief. It is respectfully submitted that no brief in support of this Motion is necessary because the pro hac vice admission of Mark Flinn and Meredith Stewart under Local Civil Rule 101.1(c) is a matter within the sound discretion of the Court, and Defendant has submitted with this Motion Declarations of Mark Flinn, Meredith Stewart and Matthew Petrozziello in support of the admission.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted with this application.

Dated: New York, New York
July 26, 2019

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